

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:17-cv-00727-RJC-DCK**

LA MICHOACANA NATURAL, LLC,

Plaintiff,

v.

LUIS MAESTRE, an individual, d/b/a LA
MICHOACANA and/or LA LINDA
MICHOACANA et al.,

Defendant.

**DECLARATION OF LAURA L. CHAPMAN
IN SUPPORT OF
MOTION TO QUASH SUBPOENA
SERVED ON NON-PARTY PLM OPERATIONS, LLC**

I, Laura L. Chapman, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Sheppard Mullin Richter & Hampton, LLP. I represent non-party PLM Operations, LLC (“PLM”). I submit this declaration in support of the Motion to Quash Subpoena Served on Non-Party PLM Operations, LLC.

2. On July 26, 2019, I received a subpoena from Plaintiff La Michoacana Natural, LLC directed to PLM. A true and accurate copy of that subpoena is attached as Exhibit 1.

3. The attached Exhibit 2 is a true and accurate copy of the letter Plaintiff’s counsel sent to me enclosing the subpoena.

4. The attached Exhibit 3 is a true and accurate copy of an email exchange I had with Plaintiff’s counsel on July 31, 2019.

5. The attached Exhibit 4 is a true and accurate copy of my correspondence with Plaintiff's counsel on August 6, 2019.

6. The attached Exhibit 5 is a true and accurate copy of my email correspondence to Plaintiff's counsel on August 7, 2019.

7. The attached Exhibit 6 is a true and accurate copy of a letter I received from Plaintiff's counsel on August 7, 2019.

8. The attached Exhibit 7 is a true and accurate copy of a letter I sent to Plaintiff's counsel on August 9, 2019. The letter is dated August 5, 2019, but that was a mistake. The letter was actually sent on August 9, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2019, at Myrtle Beach, South Carolina.


LAURA L. CHAPMAN

CERTIFICATE OF SERVICE

I certify that I served the foregoing DECLARATION OF LAURA L. CHAPMAN IN SUPPORT OF NON-PARTY PLM OPERATIONS, LLC'S MOTION TO QUASH NON-PARTY SUBPOENA on all parties of record as follows:

Via Electronic Filing

Stephen L. Anderson (attorneys@brandxperts.com)

Albert P. Allan (alallan@allanip litigation.com)

Counsel for Plaintiff

Via U.S. Mail

Luis Maestre

15008 Statesville Road

Apartment 88

Huntersville, NC 28078

Pro se Defendant

Adriana Teran

15008 Statesville Road

Apartment 88

Huntersville, NC 28078

Pro se Defendant

La Michoacana

15008 Statesville Road

Apartment 88

Huntersville, NC 28078

Pro se Defendant

/s/ Corby C. Anderson

Corby C. Anderson